



9710 Park Davis Drive, Indianapolis Indiana 46235
(317) 895-3600, (317) 895-3613 FAX

The following reply comments from Trilithic Incorporated are submitted in response to the Federal Communication Commission's Public Safety and Homeland Security Bureau request for informal comment, which is in regard to changes to the Commission's rules governing the Emergency Alert System as necessitated by the introduction of the Common Alerting Protocol, and the Federal Emergency Management Agency's deployment of its Integrated Public Alert and Warning System.

Response to EB Docket No. 04-296, DA 10-500

180 day implementation schedule

We note that an overwhelming majority of entities, including EAS Equipment Vendors and EAS Participant organizations agree that 180 days is an insufficient amount of time to complete deployment of CAP Capable equipment once FEMA publishes technical standards. In addition, we strongly agree with the comments of Gary Timm in which he recommends a separate, explicit trigger for CAP deployment. In addition to the reasons given by Gary Timm, the following reasons apply:

1. The technical standards being developed define the complexity of the interface. The full extent of the implementation task can't be known until these standards are finalized.
2. The publishing of standards by FEMA does not guarantee the ability of FEMA to handle tens of thousands of clients simultaneously. A separate, purposeful deployment trigger is a clear indication not only that the technical standards have matured, but that the supporting infrastructure is available.
3. A separate deployment trigger may be done incrementally if necessary, allowing distribution channels to gradually adjust to consumer demands.
4. Numerous administrative and procedural tasks, such as modifying State Plans and organizing communities into collaborative groups must be accomplished before deployment is possible. These may not coincide with the technical developments.
5. A separate deployment trigger will allow for a considered evaluation of the time necessary for deployment, rather than developing a deployment schedule without the necessary technical information.

Simplification of the EAN

In his comments, Gary Timm recommends (and provides individual arguments for) the elimination of locally delivered test scripts for the EAN, the elimination of the EAT, and the ending of the National Activation with the EOM code. We support and strongly encourage the adoption of all of these suggestions for the following reasons.

1. By adopting these recommendations the EAN processes and procedures can be easily supported by both SAME and CAP based delivery systems. In our (Trilithic's) prior comments we noted that CAP messages cannot be intercepted and altered in the same way that a SAME based, relayed EAN message can.
2. The change is largely procedural and is likely compatible with current EAS Encoder/Decoder operation.
3. The vast majority of ambiguity and uncertainty in the current EAN regulations is eliminated in a simple manner.
4. The use of current EAN procedures as an Emergency Management tool can not be effectively tested or practiced. In all probability the EAN will render the communications that State and Local Emergency Management are familiar with inoperable.
5. Allowing the EOM to end the National activation allows the Federal Government the ability to provide any information necessary, then relinquish control for local coordination using the tools that State and Local government are trained for and use daily. Any additional information from the Federal Government can be presented with another EAN.

Gary Timm also suggests that the EAS Handbooks become unnecessary if his proposed changes are made. We concur with the recommendation that the handbooks be eliminated.